

'08 MJ 8022

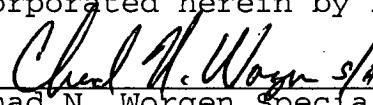
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA)	Magistrate Case No.:
)	
Plaintiff,)	COMPLAINT FOR VIOLATION OF
v.)	
Araceli BARRAZA-Barraza(1),)	21 U.S.C. § 952 and 960
Dalia BARRAZA-Barraza(2),)	Importation of a Controlled
)	Substance (Felony)
Defendants.)	
)	

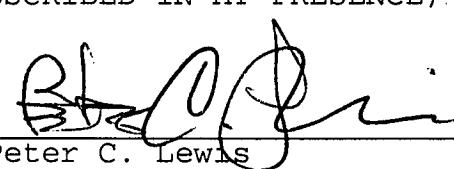
The undersigned complainant being duly sworn states:

That on or about January 15, 2008, within the Southern District of California, defendants Araceli BARRAZA-Barraza and Dalia BARRAZA-Barraza, did knowingly and intentionally import approximately 44.72 kilograms (98.38 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Section 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.


 Chad N. Worgen Special Agent
U.S. Immigration & Customs
Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 16th DAY OF JANUARY 2008.


 Peter C. Lewis
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA
2 v.
3 Araceli BARRAZA-Barraza (1)
4 Dalia BARRAZA-Barraza (2)

5 STATEMENT OF FACTS

6 This complaint is based on the reports, documents, and notes furnished to U. S. Immigration
7 and Customs Enforcement Special Agent Chad N. Worgen.

8 On January 15, 2008, at approximately 1437 hours, Customs and Border Protection Officer
9 (CBPO) C. Contreras was conducting primary inspection duties on Lane #2, at the Calexico,
10 California East Port of Entry (POE) when a 1995 Plymouth Neon with Mexican license plate number
11 BDW4393 approached his booth for inspection. The driver of the vehicle was identified as Araceli
12 BARRAZA-Barraza accompanied by two passengers, Dalia BARRAZA-Barraza and a 17-year-old
13 Mexican minor.

14 CBPO Contreras received an oral negative Customs declaration. During an inspection of the
15 vehicle, CBPO Contreras tapped the quarter panel and it tapped solid. CBPO Contreras pried open
16 the quarter panel and discovered numerous brown taped packages. CBPO Contreras called CBPO A.
17 Barnes for assistance.

18 CBPO Barnes received a negative oral Customs declaration. CBPO Barnes assisted in
19 escorting all subjects and the vehicle into the secondary lot for a more intensive inspection. CBPO
20 Barnes requested Canine Enforcement Officer (CEO) A. Garcia to screen the vehicle with his
21 Narcotics Human Detector Dog (NHDD).

22 CEO Garcia screened the vehicle with his NHDD and received a positive alert. Further
23 inspection revealed thirty-three (33) packages within the dash and quarter panels of the vehicle.
24 CBPO Barnes probed a package and it field tested positive for marijuana. The total weight of the
25 marijuana was 44.72 kilograms (98.38 pounds).

1 Special Agents (SA's) Chad Worgen and Hugo Leon responded to the Calexico East POE.

2 SA Worgen placed Araceli and Dalia BARRAZA under arrest for violation of 21 United States Code
3 952 and 960, Importation of a Controlled Substance. Each subject was read their Miranda rights,
4 which they acknowledged and waived. Each subject admitted knowledge of the marijuana concealed
5 within the vehicle. Each subject stated that they were to be paid by the smuggling organization after
6 dropping off the vehicle at the Calexico Wal-Mart parking lot. Each subject admitted that they have
7 smuggled narcotics on prior occasions. Araceli and Dalia BARRAZA were processed and
8 transported to Imperial County Jail.

9
10 SA Worgen placed the 17-year-old minor under arrest for violation of Health and Safety
11 Code 11359 possession of marijuana for sale and Health and Safety Code 11360 sale or
12 transportation of marijuana. The 17-year-old minor was processed and transported to Imperial
13 County Juvenile Hall.

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